

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region I - EPA New England**

Drafted Date: August 22, 2012

Finalized Date: September 18, 2012

**SUBJECT:** Full Compliance Evaluation of Global Companies LLC, Burlington, VT

**FROM:** Elizabeth Kudarauskas, Environmental Engineer, Air Technical Unit

**THRU:** Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit

**TO:** File

*EMK  
9/18/12  
CMS 9/19/12*

**I. Facility Information**

- A. Facility Name: Global Companies LLC
- B. Facility Location: 2 Flynn Avenue, Burlington, VT 05401
- C. Facility Mailing Address: same
- D. Facility Contact: Sid DeCell, Terminal Manager
- E. Type of Source (major/minor/sm/sm80): SM80
- F. Date Title V permit issued: January 8, 2008
- G. AFS #: 5000700027

**II Background Information**

- A. Date of inspection: August 7, 2012
- B. Weather Conditions: sunny, temps in the 80's
- C. US EPA Representative(s):
  - Beth Kudarauskas, Air Tech Unit, OES
  - Bill Osbahr, OEME
  - Mike Looney, OEME
- D. State Representative(s): none
- E. Federally Enforceable Requirements Covered During the Inspection:
  - TV Permit
  - 40 CFR Part 60 Subpart XX
  - 40 CFR Part 63 Subpart R, if applicable
  - 40 CFR Part 60 Subpart K, if applicable
  - 40 CFR Part 63 Subpart Y, if applicable
  - 40 CFR Part 63 Subpart BBBBBB, if applicable

### III Purpose of Inspection

The purpose of this inspection was to evaluate applicability and compliance of the Global Companies, LLC with respect to the Subpart R and Subpart BBBBBB MACT regulations. In addition, EPA conducted monitoring to determine whether excess VOC emissions were being emitted from the facility.

### IV Facility Description

#### A. Company / Facility History

In Vermont, Global Companies ("Global") operates one terminal. The terminal in Burlington, VT is located on Flynn Avenue.

The facility located at 2 Flynn Avenue was previously owned by ExxonMobil. In May 2007, Global purchased the terminal from ExxonMobil.

The facility is considered a "for hire terminal" meaning that Global is responsible for storing, handling and distributing the products. However, Global does not own the product.

The Global facility has four tanks that can store gasoline and a truck loading rack that is used to distribute gasoline and distillate products. Three of the lanes on the loading rack can dispense distillates and one lane can dispense gasoline. Vapors from the facility are captured and controlled by a vapor combustion unit.

#### B. Corporate Structure and CEO/President/owner name and mailing address

The Global corporate office is located at 800 South Street (PO Box 9161) Wareham, MA.

#### C. Number of Employees and Working Hours

The facility loading operations are conducted via gate access 24 hours a day, 7 days a week. Global currently employs 3 people at the Burlington, VT terminal.

### V Inspection

#### A. Entry

The EPA inspectors entered the Global facility located in Burlington, VT at 10:20 am. The EPA inspectors (Ms. Kudarauskas, Mr. Osbahr, and Mr. Looney) showed their credentials to Mr. William Manuel, Terminal Operator, and Mr. Emin Makiu, Terminal Operator.

#### B. Opening Conference

The inspectors sat down with Mr. Manuel and Mr. Makiu of Global Companies, LLC for the opening conference. During the opening conference, Ms. Kudarauskas explained that the purpose of the inspection was to evaluate compliance with air regulations.

Mr. Makiu explained that the Terminal Manager, Mr. Sid DeCell was out of the office but could be reached on another day to follow-up if necessary.

The inspectors explained that in addition to the routine inspection they would be using some monitoring equipment to evaluate facility operations. Mr. Looney explained that he brought a forward looking infra-red (FLIR) camera with him to visually detect gasoline vapor leaks. Mr. Osbahr explained that he brought equipment with him to check the pressure in the vapor lines during truck loading.

The inspectors were provided with a site map for the Burlington facility. Mr. Makiu reviewed the tank contents for the inspectors and provided the inspectors with a current listing of all tanks on the property and the product stored in each tank.

Global Oil Burlington, VT	
Tank ID	Product
39	Gasoline
38	HSD
36	HSD
37	Gasoline
33	HSD
34	ULSD (dyed)
35	HSD
30	Kerosene
29	Kerosene (dyed)
31	Kerosene
27	Super Gasoline
24	ULSD
23	LSD
28	Super Gasoline
26	Out Of Service

The Global terminal in Burlington, VT has one truck loading rack consisting of three bays. Bay 1 distributes gasoline and is connected to a vapor combustion unit ("VCU"). Bay 2 distributes distillates and is connected to the VCU. This is to prevent excess fugitive emissions from switch loading. Bay 3 top loads distillates and is not connected to any type of vapor control.

Global in Burlington, VT has a vapor combustion unit, as required by a state permit. The most

recent emissions test on the VCU was conducted on April 26, 2010. The state permit requires periodic testing of the emissions control unit.

Product is primarily brought to Global's Burlington terminal by rail. Additives are brought to the facility by truck. Although the facility is physically located on Lake Champlain, there is no dock or access to the lake from the facility.

Global does not operate a fleet of tanker trucks and there is no vehicle fueling at the terminal. There is no vehicle maintenance conducted on site and there are no degreasers at the facility.

### C. Plant Walkthrough

The inspectors conducted a walkthrough of Global's Burlington Terminal on August 7, 2012. Ms. Kudarauskas observed a total of three bays on the loading rack. The inspector did observe a truck loading gasoline during the inspection.

Mr. Looney used the FLIR cameral to observe the PVRV. Mr. Looney observed a very slight leak in the PVRV when no trucks were loading, however, no leaks were observed on the PVRV during truck loading.

The inspectors then walked through the tank farm. Mr. Looney was able to demonstrate the usefulness of the FLIR camera as he observed vapors from gasoline tanks.

### D. Records Review

The inspectors reviewed throughput records for gasoline and distillates for 2010 and 2011. The facility permit limits gasoline throughput to 200,000,000 gallons and distillate throughput to 150,000,000 gallons. In 2010 Global's gasoline throughput was 135,197,091 gallons and distillate throughput was 15,094,064 gallons. In 2011 Global's gasoline throughput was 130,117,511 gallons and distillate throughput was 15,012,192 gallons.

Ms. Kudarauskas also reviewed records for gasoline Reid Vapor Pressure (RVP). Mr. Makiu stated that RVP samples are collected monthly and the facility is aware of the state requirement to have only low RVP gasoline (which is a RVP of 9 or less) on-site starting on May 1 of each year. The inspectors spot-checked the RVP for several tanks in 2012. For example, Tank 37 had an RVP of 8.98 on April 26, 2012.

According to the Annual Emisisions Statement, Global's Burlington, VT facility reported VOC emissions of 29.59 tons per year and total HAP emissions of 0.502 tons per year.

The most recent compliance test was conducted on the VCU on April 26, 2010 and was used to

demonstrate compliance with the MACT BBBBBB. The VCU was serviced most recently by John Zinc Company on 6/13/2012.

E. Closing Conference

The inspectors conducted a brief closing conference at the end of the day. Ms. Kudarauskas reviewed the inspection with the facility and suggested that during the next scheduled service call, the contractor look at the PVRV and evaluate any possible leaks. The facility agreed to have the PVRV evaluated during the next service call.

The inspectors left the facility at approximately 2:00 pm.

